

**UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE**

IN THE MATTER OF THE SEARCH OF )  
FOUR BAGS SEIZED FOLLOWING ) Case No.2:23-mj-00114  
TYLER CAMPBELL'S ARREST )  
ON APRIL 26, 2023 ) Filed Under Seal

**AFFIDAVIT IN SUPPORT OF  
AN APPLICATION FOR A SEARCH WARRANT**

I, Kristopher Sullivan, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the United States Drug Enforcement Administration (“DEA”). I have worked in federal law enforcement since 2013. I am presently assigned to DEA’s Portland, Maine Resident Office. Over the course of my law enforcement career, I have had the opportunity to search, seize, and personally observe what I have recognized to be and what was later confirmed by laboratory analysis to be scheduled drugs, such as fentanyl, methamphetamine, and various narcotics lawfully available only by prescription. I have been the affiant for two Title III wiretap investigations. I have conducted or participated in surveillance, undercover transactions, debriefings of informants and confidential sources, and reviews of recorded communications related to drug trafficking. Additionally, I have executed or assisted in the execution of numerous warrants in which drugs, drug paraphernalia, and other contraband were found. Through my training and experience, I have become familiar with the habits, methods, and procedures commonly employed by individuals engaged in drug trafficking, including how they store, carry, and transport drugs and drug proceeds while traveling.

2. I submit this affidavit in support of an application under Federal Rule of Criminal Procedure 41 for a warrant authorizing the search of four bags (“Target Bags”) that were seized

following DEA's arrest of Tyler Campbell ("Campbell") on April 26, 2023. Photographs and particularized descriptions of each of the Target Bags are included in Attachment A. The items to be seized from the Target Bags are set forth in Attachment B.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other members of law enforcement and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all my knowledge about this matter.

4. Based on the facts set forth in this affidavit, there is probable cause to believe that violations Title 21, United States Code, Sections 841, 843, and 846 (drug trafficking, unlawful use of a communications facility, and conspiracy to commit drug trafficking) have been committed by Campbell and his associates. There also is probable cause to search the Target Bags as further described in Attachment A for evidence, contraband, and instrumentalities concerning these criminal violations as further described in Attachment B.

#### **PROBABLE CAUSE**

5. I adopt and incorporate the affidavit that DEA TFO Daniel Donovan submitted in support of a criminal complaint charging Campbell with one count of distribution of fentanyl and methamphetamine, which is attached as Exhibit A.

6. On April 26, 2023, law enforcement learned that Campbell was a registered guest at a particular hotel in Portland, Maine, and that Campbell was scheduled to check out of his hotel room shortly. Law enforcement watched Campbell and his girlfriend exit the hotel. At the time the pair exited the hotel, law enforcement saw that Campbell was carrying two different backpacks and that Campbell's girlfriend was carrying a black Omerta duffle bag, a striped reusable shopping tote, and a black Steve Madden purse.

7. Law enforcement arrested Campbell. As part of the search incident to arrest, law enforcement searched Campbell's person and located a wallet with an undetermined amount of U.S. currency and a cellophane bag containing approximately 27.9 grams of suspected methamphetamine.<sup>1</sup> Law enforcement also searched the two backpacks that Campbell was carrying at the time of his arrest. Inside one of the backpacks was an additional quantity of U.S. currency, drug paraphernalia, and a small black Omerta case with a lock, which law enforcement secured pending issuance of a search warrant. Law enforcement also secured the three bags that Campbell's girlfriend was carrying pending issuance of a search warrant.

8. Prior to leaving the scene, Campbell's girlfriend told law enforcement that she was diabetic and asked law enforcement to allow her to retrieve her insulin from one of the bags. Law enforcement told Campbell's girlfriend that, for officer safety reasons, law enforcement would need to assist her with the retrieval of her insulin. Campbell's girlfriend stated that she understood, and law enforcement helped Campbell's girlfriend retrieve her insulin from a makeup bag housed inside of the striped reusable shopping tote. While assisting Campbell's girlfriend with the retrieval of her insulin, law enforcement saw suspected drugs and suspected drug paraphernalia in plain view inside of the striped reusable shopping tote.

9. Following his arrest, law enforcement advised Campbell of his *Miranda* rights, which Campbell verbally acknowledged that he understood. Campbell stated that all of the bags belonged to him. Campbell also admitted that he met with a named individual the previous night and purchased \$2,000 worth of drugs from this named individual. Moreover, Campbell admitted that on top of the \$2,000 worth of drugs that he purchased the previous evening, the same named

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<sup>1</sup> A TruNarc test of the suspected methamphetamine was presumptively positive for the presence of methamphetamine.

individual also advanced him an unspecified additional quantity of drugs. Campbell added that the small black Omerta case with a lock contained a few ounces of drugs as well.

10. Based on my training and experience and the training and experience of other law enforcement personnel with whom I have spoken and worked, I know the following:

- a. Drug traffickers often store drugs and drug proceeds in private places, including their residences, their vehicles, and other secure locations that are provided or maintained by them or one or more associates;
- b. When traveling from one location to another, drug traffickers often carry drugs and drug proceeds either on their person or near their person typically in bags, safes, or other locked containers that they use to store drugs, drug proceeds, and other evidence of drug trafficking, which allows them not only to keep these items relatively secure and private, but also to keep them nearby and easily accessible while in transit;
- c. Drug traffickers often possess and store firearms, ammunition, and other dangerous weapons in their residences, their vehicles, and other secure locations where their drugs and drug proceeds are being carried, stored, or transported, in order to protect themselves, their supplies of drugs, and their drug proceeds;
- d. Drug traffickers often keep, on hand, large quantities of U.S. currency in order to maintain and finance their drug trafficking activities;
- e. Drug traffickers often keep books, records, receipts, notes, ledgers, and other papers related to ordering, purchasing, transporting, and distributing drugs in private places where drug traffickers have ready access to them, including their residences, their vehicles, and other secure locations where their drugs, drug proceeds, and other evidence of drug trafficking are being carried, stored, or transported; and

f. Drug traffickers often use cellular telephones, other digital devices, and electronic storage media in furtherance of their drug-related criminal activities.

## CONCLUSION

11. I respectfully submit, based on the facts set forth in the affidavit that DEA TFO Daniel Donovan submitted in support of a criminal complaint charging Campbell with one count of distribution of fentanyl and methamphetamine and based on the additional facts set forth herein, there is probable cause to believe that violations Title 21, United States Code, Sections 841, 843, and 846 (drug trafficking, unlawful use of a communications facility, and conspiracy to commit drug trafficking) have been committed by Campbell and his associates. There also is probable cause to search the Target Bags as further described in Attachment A for evidence, contraband, and instrumentalities concerning these criminal violations as further described in Attachment B.

Respectfully submitted,



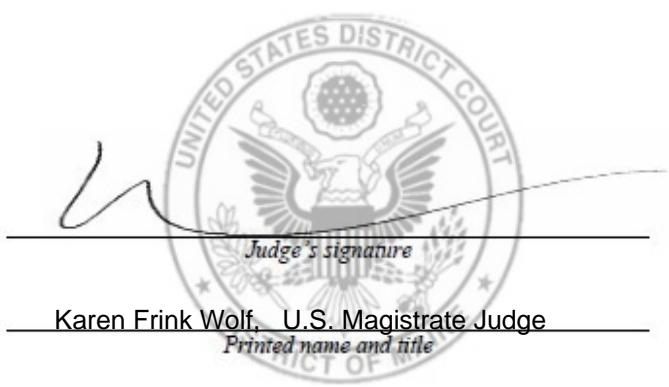
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Kristopher Sullivan, Special Agent  
U.S. Drug Enforcement Administration

Sworn to telephonically and signed  
electronically in accordance with the  
requirements of Rule 4.1 of the Federal Rules  
of Criminal Procedures

Date: May 02 2023

City and state: Portland, Maine



Karen Frink Wolf, U.S. Magistrate Judge

Printed name and title